

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

GABRIEL ANDREW REYES

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 2252(a)(2) and
2252(b)(1)

COUNT ONE

Distribution of Images Depicting the Sexual Exploitation of Children

The Grand Jury Charges:

From in or about January 2023 to in or about April 2024, in the District of North Dakota, and elsewhere,

GABRIEL ANDREW REYES

knowingly distributed visual depictions using a means and facility of interstate and foreign commerce, to wit, the internet, which depictions had been transported in interstate and foreign commerce by any means, including by computer, the production of which visual depictions involved the use of a minor engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT TWO

Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about January 2023 to in or about April 2024, in the District of North Dakota, and elsewhere,

GABRIEL ANDREW REYES

knowingly received visual depictions using a means and facility of interstate and foreign commerce, to wit, the internet, which depictions had been transported in interstate and foreign commerce by any means, including by computer, the production of which visual depictions involved the use of a minor engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

FORFEITURE NOTICE

Upon conviction of violating Title 18, United States Code, Section 2252, as charged in this Indictment,

GABRIEL ANDREW REYES

shall forfeit to the United States any and all matter which contains visual depictions produced, transported, shipped, and received in violation thereof and any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violations, including, but not limited to, the following:

- One red iPhone XR with Serial Number F71YF1R9KXKQ;
- One iPhone 12, with Serial Number R19HJ66DCG;

By virtue of commission of one or more of the felony offenses as charged in this Indictment, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States, pursuant to Title 18, United States Code, Section 2253(a).

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Mac Schneider
MAC SCHNEIDER
United States Attorney

GLD/tmg